

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

M. KATHLEEN McKINNEY, Regional)	
Director of Region 15 of the National Labor)	
Relations Board, for and on behalf of the)	
NATIONAL LABOR RELATIONS BOARD,)	
)	
Petitioner,)	
)	
v.)	No. 22-cv-2292
)	Judge Sheryl H. Lipman
STARBUCKS CORPORATION,)	
)	
Respondent)	

MOTION OF WORKERS UNITED FOR LEAVE TO FILE REPLY

Workers United hereby seeks leave to file a reply brief in support of its Motion to Intervene, *see* Dkt. 26. Workers United believes the reply would further aid the Court in assessing the parties' arguments. A reply brief is attached.

Respectfully submitted this 16th day of May 2022.

/s/ Michael Schoenfeld
Michael Schoenfeld
GA Bar No. 863727
Admitted pro hac vice
Stanford Fagan LLC
2540 Lakewood Ave. SW
Atlanta, GA 30315
michaels@sfglawyers.com
404-402-1220

Mary Joyce Carlson
DC Bar No. 987939
Pro hac vice motion forthcoming
Counsel to Workers United Starbucks Campaign
1629 K St. NW, Suite 1050

Washington, DC 20006
carlsonmjj@yahoo.com
Tel: 202-230-4096

Ian Hayes
NY Bar No. 5265889
Pro hac vice motion forthcoming
Hayes Dolce
471 Voorhees Ave.
Buffalo, NY 14216
ihayes@hayesdolce.com
Tel: 716-608-3427

CERTIFICATE OF SERVICE

I certify that on May 16, 2022, the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael Schoenfeld
Michael Schoenfeld